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March 6, 2023

**Via ECF**

Hon. Zahid N. Quraishi, U.S.D.J.  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Courtroom 4W  
Trenton, NJ 08608

**Re: K.S.D. v. Ryan, et al.  
Civil Case Action No. 3:21-cv-20270-ZNQ-LHG**

Dear Judge Quraishi:

This firm serves as counsel to Defendant Roderick Newbold Ryan ("R.N.R.") in the above referenced matter. We write in connection with Plaintiff's Motion for Leave to File a Second Amended Complaint (ECF 54), returnable on March 20, 2023. Although R.N.R. does not oppose Plaintiff's Motion for Leave to File a Second Amended Complaint, R.N.R. specifically and expressly reserves all rights under the Federal Rules of Civil Procedure to timely move to dismiss the complaint, including, *inter alia*, under Rule 12(b)(6) for failure to state a claim and any other reasons as may be appropriate.

Respectfully submitted,

CONNELL FOLEY LLP

/s/ Leo J. Hurley, Jr.  
Leo J. Hurley, Jr., Esq.

LJH/  
cc: All Counsel

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